

**s. 22(1)(a)(ii)**

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**From:** AA Canberra <AA.Canberra@agriculture.gov.au>  
**Sent:** Thursday, 12 August 2021 11:52 AM  
**To:** **s. 47F(1)**  
**Subject:** RE: [EXTERNAL EMAIL] Att. **s. 22(1)(a)(ii)** -CM9: Proposed diversion of waste to a bioenergy facility [SEC=OFFICIAL]

Thanks **s. 47F(1)**.

Regards

s. 22(1)(a)(i)

**s. 22(1)(a)(ii)**

Assistant Director | Approved Arrangements | Biosecurity Compliance Branch | Compliance and Enforcement Division

Phone: **s. 22(1)(a)(ii)**

Department of Agriculture, Water and the Environment

18 Marcus Clarke Street, Canberra City ACT 2601

GPO Box 858, Canberra City ACT 2601, Australia

agriculture.gov.au

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**From:** **s. 47F(1)** <**s. 47F(1)**>  
**Sent:** Thursday, 12 August 2021 9:50 AM  
**To:** AA Canberra <AA.Canberra@agriculture.gov.au>  
**Cc:** **s. 47F(1)** <**s. 47F(1)**>  
**Subject:** RE: [EXTERNAL EMAIL] RE: Att. **s. 22(1)(a)(ii)** -CM9: Proposed diversion of waste to a bioenergy facility [SEC=OFFICIAL]

Hi s. 22(1)(a)(i)

I have provide **s. 47F(1)** with a copy of the email I sent to you and he is happy to discuss the project when the department makes contact

Regards

**s. 47F(1)**

s. 47F(1)

Quality Business Partner - Compliance

a: 64-67 Richards Road, Castlemaine. VIC 3450  
s. 47F(1) isdonisgood.com.au



From: AA Canberra <AA.Canberra@agriculture.gov.au>  
Sent: Thursday, 12 August 2021 8:42 AM  
To: s. 47F(1) <s. 47F(1)>  
Cc: s. 47F(1) <s. 47F(1)>  
Subject: [EXTERNAL EMAIL] RE: Att. s. 22(1)(a)(ii) -CM9: Proposed diversion of waste to a bioenergy facility [SEC=OFFICIAL]

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognise the sender and know the content is safe.

Hi s. 47F(1)

Thank you very much for the information in the email below. Apologies for the delay in responding.

The department will contact Mount Alexander Bioenergy for further information relating to the process.

Many thanks

s. 22(1)(a)(i)

s. 22(1)(a)(ii)

Assistant Director | Approved Arrangements | Biosecurity Compliance Branch | Compliance and Enforcement Division

Phone: s. 22(1)(a)(ii)

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From: s. 47F(1) <s. 47F(1)>  
Sent: Thursday, 5 August 2021 2:19 PM  
To: AA Canberra <AA.Canberra@agriculture.gov.au>

Cc: s. 47F(1) <s. 47F(1)>

Subject: Att. s. 22(1)(a)(ii) -FW: CM9: Proposed diversion of waste to a bioenergy facility [SEC=OFFICIAL]

Good morning <sup>s. 22(1)(a)(ii)</sup>

Thanks for the opportunity yesterday to discuss this concern with you. As discussed, this project is a separate entity to George Weston Foods and has sort to engage with the Don site (Castlemaine) to investigate symbiotic opportunities to reduce waste to landfill and greenhouse gas emissions.

The key site contact is Alternate contact is myself

s. 47F(1)

Quality Assurance Manager

s. 47F(1)

As mentioned in recent media articles Mount Alexander Sustainability Group (MASG) is a planning a community lead bioenergy facility which DON will be proudly supporting.

- **Entity that proposes to design, build and operate the facility**

This proposal is solely owned by the Mount Alexander Sustainability Group (MASG)

Email [info@masg.org.au](mailto:info@masg.org.au) Telephone s. 47F(1) , Postal address PO Box 1043 Castlemaine Vic 3540, Related web sites <http://masg.org.au/bioenergystatement/> and operating this project under Mount Alexander Bioenergy <https://www.bioenergy.net.au/>

The contact person is **DEANE BELFIELD**, *FIEAust. MEnv.Sci.*

**Deane Belfield**, Managing Director, **ECO2Sys**

**M:** s. 47F(1)

**E:** s. 47F(1)

**W:** [www.eco2sys.com](http://www.eco2sys.com)

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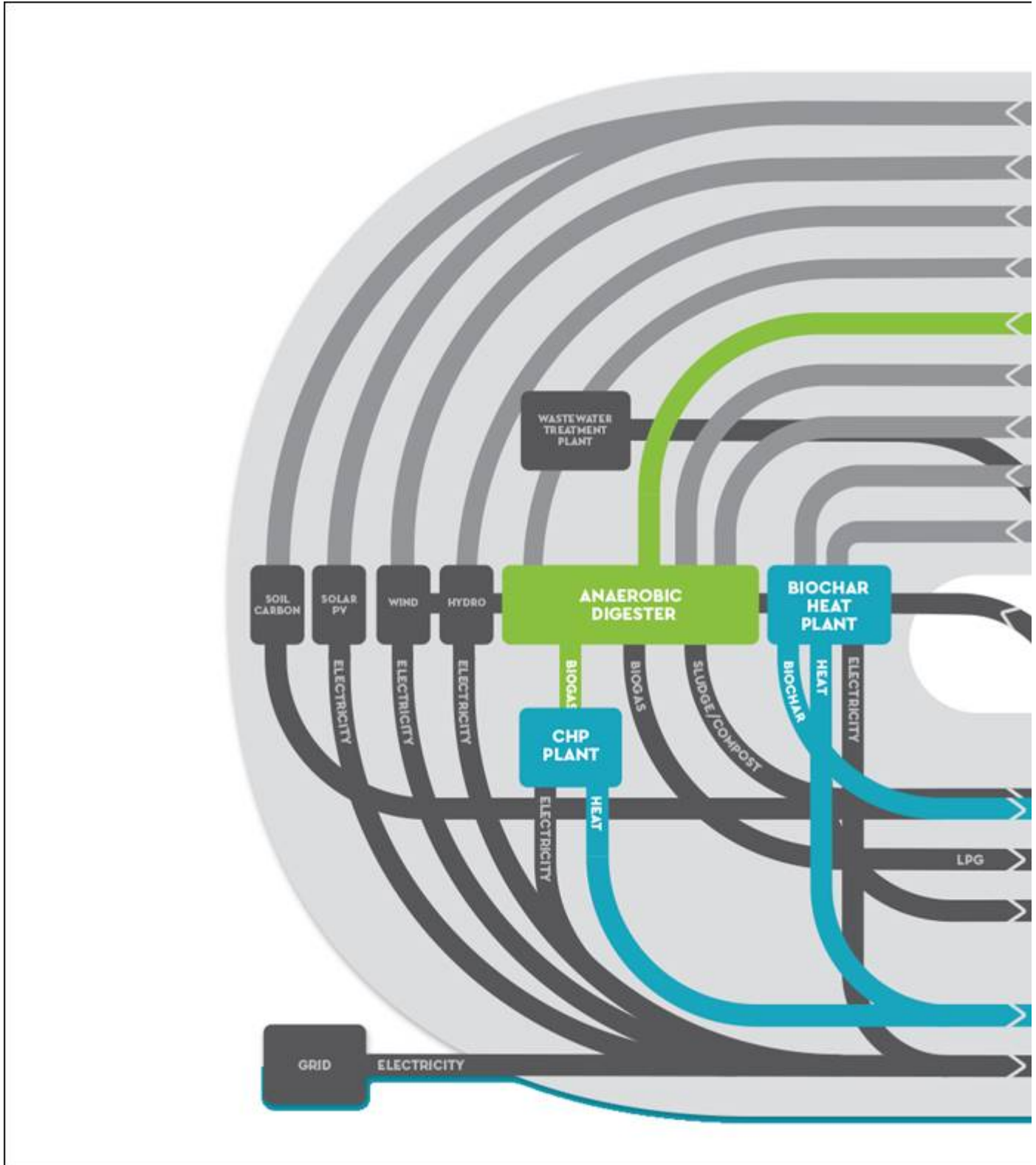
*Deane is CEO, Mt Alexander Bioenergy, and leads Mt Alexander Sustainability Group's (MASG) Community "Bioenergy from Waste to Energy" project.*

*He is also the managing director of ECO2Sys, a sustainability consultancy, specializing in developing circular economy and renewable energy business solutions. Prior to establishing ECO2Sys, Deane spent over 20 years with global blue-chip companies, and served as a director of one of the big four management consulting firms.*

*"The pre-construction phase is currently underway, which will ensure the bioenergy facility's design meets all regulatory and environmental requirements, as well as community expectations. To-date, significant contributions have been received and committed, including investment from DON, with additional investors required for the planned facility to progress into its construction phase. Engagement with the community and stakeholders will be ongoing, led by the team at MASG."*

The proposed facility is looking to source organic material as per the diagram below.

Green line is the organic material, blue line is the output of the waste treatment process (heat for energy to the Don Smallgoods site, Biochar as activated carbon back to land enhancement use). Grey & Black lines are not part of the proposed process.



Timing of the project is fully dependent on MASG sourcing funding and approvals from the required regulatory bodies. Community engagement is ongoing.

- **Details of how this proposal is supported by Don and if it may involve material derived from or contaminated by imported pig meat**

Don's support is by way of

- providing land (to the north of the Don factory) under a commercial lease agreement,
- being one potential source of organic material (quarantine waste including any other organic material waste produced on site and managed under our current Approved Arrangement), and
- purchasing back the energy to support the operation of the factory.

Key senior Don employees have been involved in a working group with MASG and, in relation to imported pig meat waste, have provided MASG with:

- a copy of the Approved Arrangements for 3.2 – Imported pig meat processing Requirements to ensure that MASG fully understand the requirements for handling quarantine waste generated by Don
- discussion to ensure MASG understand that the Waste to Bioenergy plant must meet all Biosecurity requirements and be registered as an approved independent site to enable Don to seek approval to use the site as waste treatment provider
- discussion to ensure MASG understands that the waste handling and treatment processes proposed under this initiative requires approval by Biosecurity Aust (Dept of Ag) as the proposed treatments are not currently approved under our AA
- discussions to ensure MASG understand the due diligence required of their entity to have the appropriate scientific based information to address biosecurity concerns regarding imported pig meat waste, and
- direction that MASG need to engage with Biosecurity Aust (Dept of Ag) directly as the owners of this enterprise and to do so at the earliest time, to ensure any proposed alternate waste treatment processes are approved by the Department's compliance team .

### In Summary

1. The proposed 'Bioenergy from Waste' facility is the solely under the control of Mount Alexander Sustainability Group (contact details and web site links above).
2. The proposed location of the facility is on vacant land owned by George Weston Foods at the northern end of their Don Smallgoods facility, Castlemaine Victoria
3. It is proposed that Don could provide organic waste under a commercial agreement once the site has all the required registrations and regulatory approvals, including Dept of Ag approvals to changes to the AA for the Castlemaine site
4. Any and all communication with the Department in relation to this site and its operation as a receiver and treatment of imported pig meat waste is the sole responsibility of MASG
5. Don will only engage with the site once it is fully approved by the Department and has all waste treatment processes approved, as is our current practice with any waste treatment provider we engage with

## s. 47F(1)

Quality Business Partner - Compliance

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**From:** AA Canberra <[AA.Canberra@agriculture.gov.au](mailto:AA.Canberra@agriculture.gov.au)>

**Sent:** Thursday, 5 August 2021 8:14 AM

**To:** s. 47F(1) <s. 47F(1)>

**Subject:** [EXTERNAL EMAIL] FW: CM9: Proposed diversion of waste to a bioenergy facility [SEC=OFFICIAL]

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognise the sender and know the content is safe.

Hi s. 47F(1)

It was good to talk to you yesterday.

As mentioned, our attention has been drawn to the biochar waste proposal at your Castlemaine site and we had previously sent s. 47F(1) an email seeking further information (see below). From our discussion yesterday, I understand that s. 47F(1) is no longer the manager for the approved arrangement (AA, ref. no. V2828). Firstly, I would be grateful if you could advise the name and contact details (email, phone) of the person who George Weston Foods Ltd wishes to nominate as the manager of the AA.

Secondly, we would be appreciate any information you are able to provide on the proposed project, including details of the:

- Waste streams that would be involved in the process
- Process, including the derivatives (i.e. products, by-products, waste products) of the process and the intended use of these
- Timelines for the project.

Many thanks

s. 22(1)(a)(i)

s. 22(1)(a)(ii)

Assistant Director | Approved Arrangements | Biosecurity Compliance Branch | Compliance and Enforcement Division

Phone: s. 22(1)(a)(ii)

Department of Agriculture, Water and the Environment  
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**From:** AA Canberra

**Sent:** Tuesday, 27 July 2021 6:36 PM

**To:** s. 47F(1)

**Subject:** CM9: Proposed diversion of waste to a bioenergy facility [SEC=OFFICIAL]

Dear s. 47F(1)

The Department of Agriculture, Water and the Environment (the department) has been made aware of a proposal that indicates an intention on the part of George Weston Foods Ltd to direct waste into a bioenergy process at its Castlemaine site (see related media article below).

<https://www.abc.net.au/news/2021-06-07/planned-bioenergy-facility-for-castlemaine/100194430>

The department recognises that George Weston Foods Ltd is the biosecurity industry participant for an approved arrangement (reference number V2828) under the *Biosecurity Act 2015*. This approved arrangement allows George Weston Foods Ltd to process imported uncooked pig meat subject to strict biosecurity conditions, including conditions relating to the management of biosecurity risks associated with waste from these processing operations. Similarly, import permits for uncooked pig meat prescribe conditions for the processing of the pig meat and the management of waste.

**s. 47G(1)(a)**

As a starting point, I would be grateful if you could provide:

- Advice on whether George Weston Foods Ltd is intending to pursue the proposal
- Details of how this proposal may involve material derived from or contaminated by imported pig meat
- Details of any previous communications with the department on this matter.

Kind regards

**s. 22(1)(a)(ii)**

Assistant Director | Approved Arrangements | Biosecurity Compliance Branch | Compliance and Enforcement  
Division

Phone: **s. 22(1)(a)(ii)**

Department of Agriculture, Water and the Environment  
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**s. 22(1)(a)(ii)**

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**From:** Deane Belfield <[s. 47F\(1\)](#)>  
**Sent:** Thursday, 25 November 2021 11:56 AM  
**To:** AA Canberra  
**Subject:** Re: Attention: [s. 22\(1\)\(a\)\(ii\)](#) (regarding Mt Alexander Bioenergy, Castlemaine, VIC)  
[SEC=UNOFFICIAL]  
**Attachments:** Biosecurity Prelim Assmnt MAB Project Outline v2.1.docx  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed  
**Categories:** [s. 22\(1\)\(a\)\(ii\)](#)

Hi [s. 22\(1\)\(a\)\(ii\)](#)

Please see attached a draft of the proposed bioenergy facility 'application for assessment'.

As discussed I would appreciate any feedback you have. I have left in track change mode should you wish to make comments.

Kind Regards

Deane Belfield  
Managing Director  
**ECO2Sys**  
FIEAust. CPEng

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On 3 Oct 2021, at 8:26 pm, AA Canberra <[AA.Canberra@agriculture.gov.au](mailto:AA.Canberra@agriculture.gov.au)> wrote:

Hi Deane

Apologies for the time taken to respond to your email. Our technical area has been exceptionally busy over these past weeks.

The technical area has advised that the following details will facilitate commencement of preliminary assessment of the suitability of the proposal:

- A. Detailed description of the types of biosecurity waste (waste profile) to be used in the proposed treatment process.
- B. Description of how and where the waste will be transported to and received at and stored at the facility prior to processing.



- C. Detailed description of the processing stages, including details of the type of process, the technologies used and the process parameters (e.g. time, temperature, pressure) for each stage.
- D. Details of the measures and methods (e.g. measuring equipment, technologies, calibration methods) that will provide verifiable assurance that the process parameters have been attained.
- E. Detailed descriptions of the products, by-products and waste products, including a description of their physical attributes/parameters, that will be produced at each stage of the proposed treatment process.
- F. Descriptions of the proposed treatment and/or disposal methods and paths of each waste product.
- G. Descriptions of proposed end uses for each product or by-product (e.g. stockfeed, cattle therapeutics, compost, soil conditioner/fertiliser).
- H. What type of feedstock, if any (e.g. domestic waste product, woodchip) will be blended with the biosecurity waste prior to processing?
- I. What is the proposed ratio of feedstock to biosecurity waste?
- J. How and where will blending of feedstock occur?
- K. Is there an optimal moisture content that the feedstock needs to be in order to be processed using the proposed technology?
- L. If there is an optimal moisture content that the feedstock needs to be, how is this achieved and what waste (liquid?) is produced as this point?

Please note the following points for additional clarification:

- Any approval of an arrangement could be under Class 8.4 rather than Class 3.0. Conditions for all classes are available at <https://www.agriculture.gov.au/import/arrival/arrangements/requirements>
- Regardless of the particular class, a large proportion of conditions that would apply to such an approved arrangement can be expected to be customised, non-standard conditions that would need to be developed by the department and which would be specific to the particular processes involved at the facility.
- It is unlikely that the department will require compliance with a Site Operations Manual under any approved arrangement that is ultimately approved. However, in the assessment of any application for an approved arrangement, the department may well require provision of information of a nature that might be found in your Site Operations Manual. The department may use this (and other) information to develop conditions to which the approved arrangement would be subject and would be audited against.
- While the department can provide an in-principle indication of the suitability of a process and end-uses, a formal legislative approval of a proposed arrangement is not possible until the facility is built and audited for compliance with the conditions of the proposed arrangement.

Regards

s. 22(1)(a)(ii)

Assistant Director | Approved Arrangements | Biosecurity Compliance Branch | Compliance and Enforcement Division

Phone: s. 22(1)(a)(ii)

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**From:** Deane Belfield <[s.47F\(1\)](mailto:s.47F(1)@agriculture.gov.au)>  
**Sent:** Thursday, 2 September 2021 3:28 PM  
**To:** AA Canberra <[AA.Canberra@agriculture.gov.au](mailto:AA.Canberra@agriculture.gov.au)>  
**Subject:** Attention: [s.22\(1\)\(a\)\(ii\)](mailto:s.22(1)(a)(ii)@agriculture.gov.au) (regarding Mt Alexander Bioenergy, Castlemaine, VIC)  
 [SEC=UNOFFICIAL]

Hi [s.22\(1\)\(a\)\(ii\)](mailto:s.22(1)(a)(ii)@agriculture.gov.au)

Further to our chat yesterday I have documented some of the pointed I noted from our conversation. Can you please review what I have written and edit as you see appropriate, including content and sequence of steps, particularly the ADDENDUM section.

This would be of great help.

~~~~~

**Details of the Outline document to be sent to [s.22\(1\)\(a\)\(ii\)](mailto:s.22(1)(a)(ii)@agriculture.gov.au) include:**

- A. The streams of bio-security waste to be processed are: .....
- B. Storage of waste: .....
- C. Processes to be undertaken, inc. nature of waste, parameters of the waste such as processing stage, time, temperature, and how it works
- D. Technologies to be used to enable these processes: .....
- E. Waste products and their destinations (measure and reported): .....
- F. Co-products and end-use: .....inc on farm land etc
- G. Locations: ....

**ADDENDUM:**

The following points reflect MASG's understanding of the stages involved with acquiring an "Approved Arrangement Class 3.0" for the handling and treatment of Don Smallgoods pig meat waste in the proposed bioenergy facility:

- MASG to submit Outline (this document) for bioenergy facility processing of waste meat
- BioSecurity assesses the 'outline' document and give assurance that the risk is manageable to an acceptable level [this stage can take 2 months before response returned to MASG]
- BioSecurity provides letter confirming they provide assurance that the risk is manageable to an acceptable level
- Plant is designed around the feedback from BioSecurity, as appropriate
- Plant is built and documentation of supporting processes is developed and training of operators provided
- MASG submits and application for "Approved Arrangement Class 3.0" which details the labelling required, record keeping required, the SOP documentation etc. all of which would be included in the Site Operations Manual; this should contain detail such as signage, structures, and the list of credited persons ...

- BioSecurity does a conditional “pre-approval”, after plant is built
- BioSecurity provides the “Approved Arrangement for Class 3.0” bespoke for this application

NOTE that the timing and sequence of these activities needs to be reviewed by <sup>s. 22(1)(a)(ii)</sup>

~~~~~

Kind Regards

Deane Belfield  
 Project Director - Mt Alexander Bioenergy

Managing Director  
**ECO2Sys**  
 FIEAust. CPEng

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**S. 11C(1)(b)**

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